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6 Attorney for Victor Ramone Wright

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 VICTOR RAMONE WRIGHT,  
14 Defendant.

Case No. 2:21-cr-00024-APG-DJA  
**STIPULATION TO CONTINUE  
EVIDENTIARY HEARING**  
(First Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
17 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for  
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha  
19 Brooks-Whittington, Assistant Federal Public Defender, counsel for Victor Ramone Wright,  
20 that the Evidentiary Hearing currently scheduled on March 17, 2023 at 9:00 a.m., be vacated  
21 and continued to a date and time convenient to the Court, preferably on March 30, 2023 or  
22 thereafter.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel will be out of the jurisdiction from March 16-17, 2023, and  
25 therefore unavailable for the currently scheduled evidentiary hearing. Counsel has represented  
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Mr. Wright since September 27, 2021 (ECF No. 33) and to afford him the continuity of defense counsel, a continuance is requested.

2. The defendant is not in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

This is the first request for a continuance of the evidentiary hearing.

DATED this 9th day of March 2023.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

*/s/ Nisha Brooks-Whittington*  
By \_\_\_\_\_  
NISHA BROOKS-WHITTINGTON  
Assistant Federal Public Defender

*/s/ Daniel J. Cowhig*  
By \_\_\_\_\_  
DANIEL J. COWHIG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 VICTOR RAMONE WRIGHT,

7 Defendant.  
8

Case No. 2:21-cr-00024-APG-DJA

**ORDER**

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10 Based on the stipulation and good cause appearing;

11 IT IS ORDERED that the Evidentiary Hearing currently scheduled for Friday,  
12 March 17, 2023 at 9:00 a.m., be vacated and continued to March 30, 2023 at the hour  
13 of **9:00 a.m.**

14 DATED this 10<sup>th</sup> day of March 2023.

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17 UNITED STATES MAGISTRATE JUDGE  
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